

ORIGINAL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

FILED  
U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
FT. WORTH DIVISION

2014 JUL 22 AM 9:14

UNITED STATES OF AMERICA

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v.

4:14-CR-0023 - A

CHRISTOPHER ROBERT WEAST

CLERK OF COURT

**DEFENDANT CHRISTOPHER ROBERT WEAST'S**  
**SUPPLEMENTAL MOTION FOR LEAVE FOR**  
**DESIGNATION OF EXPERT WITNESS**

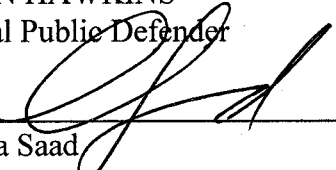
COMES NOW, the Defendant, CHRISTOPHER ROBERT WEAST, by his counsel, Angela Saad, Assistant Federal Public Defender, and hereby files this supplemental motion for leave for filing supplemental designation of expert in the above styled case, and shows the Court the following:

The defendant hereby designates Bill McGregor as an expert for trial. It is anticipated that Mr. McGregor will testify that computers are susceptible to remote access and hacking, via the internet, wireless router, access by other individuals, and other means. The expert will testify that due to the current state of technology that it is not possible to know if a visual depiction, like a photograph or video, is an actual minor when looking at the image. At this time, and due to defense counsel's recent appointment to represent Mr. Weast, Mr. McGregor has not yet viewed the images and video indicted in this case. Nevertheless, Mr. McGregor's opinion remains the same.

Mr. McGregor has been in the information technology field for over twenty years through the government and private sector. His work for the government included top secret clearance work in the information technology field. He holds an associates degree, a bachelors degree, and masters-degree-level courses in information management. He has training and expertise in network security, computer forensics, security and information warfare, and private investigations. His curriculum

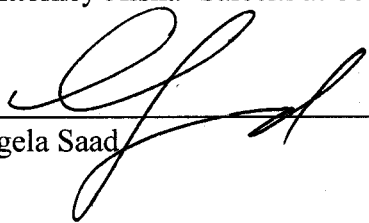
vitae has been provided to the prosecution on July 18, 2014.

Respectfully submitted,  
JASON HAWKINS  
Federal Public Defender

BY:   
Angela Saad  
TX Bar No. 24059016  
Asst. Federal Public Defender  
819 Taylor Street, Room 9A10  
Fort Worth, TX 76102-6114  
817-978-2753  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I, Angela Saad, hereby certify that on July 22, 2014, a copy of the foregoing supplemental motion was hand delivered to Assistant United States Attorney Aisha Saleem at 801 Cherry St., Suite 1700, Fort Worth, Texas 76102-6897.

  
Angela Saad